

EXHIBIT A

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July 11, 2023

VIA ECF

Honorable Judge Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Courtroom 4GN
Brooklyn, New York 11201

Re: Scylla et. al v Amazon Labor Union et. al.
Case No. 23-cv-05261

Dear Honorable Judge Donnelly

I write as labor counsel to the Amazon Labor Union. We are aware of the filing by Mr. Arthur Schwartz on behalf of some members claiming to be a caucus in the union who are demanding this Court intervene in the union's internal affairs by ordering an election. I received an email from Mr. Schwartz at 3:59 today stating that if I did not appear in the case by 4 pm that this Court would schedule the case for hearing without my input. Mr. Schwartz claimed to have sent a letter at 12:30 pm advising me of this but I received no letter. Upon further inquiry it was discovered that Mr. Schwartz had sent this letter to the wrong email address.

We called the court and now understand that the Court will address the matter through ECF.

I also want to bring to the Court's attention that Mr. Schwartz filed on the record [Dkt 10] a copy of the notice of motion for sanctions and the memorandum in support thereof. These documents were improperly filed. They appear as if I did not send Mr. Schwartz a 21-day safe harbor letter, with the requisite notice of hearing and memorandum. I not only sent a 21-day safe harbor letter to Mr. Schwartz with the motion and memorandum, I also sent him a pre-filing letter advising him that his client knows that the union constitution he seeks to enforce was never formally adopted by the full executive board and asked him not to go forward with this litigation or face sanctions. In the 21-day safe harbor letter, motion, and memorandum, I identified myself as attorney for the defendants, but I do not have an appearance filed. In fact, our clients have not been served. We are still conferring with our client to determine if they will be seeking other counsel to handle this litigation.

Mr. Schwartz stated he was willing to waive the 21 days and start with the sanctions motion, but that is not his choice.

I am requesting that the docket entry with the motion for sanctions and supporting papers be removed from the docket as improperly filed.

Respectfully submitted

/s/

Jeanne Mirer

Cc: Arthur Schwartz